

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
ANWER RAO et. al.,) Nos. 14-CR-150-JAR-TCM
MARK PALMER et. al.,) 14-CR-175-AGF-DDN
GREG SLOAN et. al.,) 14-CR-152-RWS-NCC
PAMELA TABATT et. al . ,) 14-CR-187-JAR-DDN
)
Defendants.)

**DEFENDANTS' JOINT MOTION FOR AN EXTENSION OF TIME TO FILE
PRETRIAL MOTIONS**

Come now Defendants, by their respective attorneys, and for this Joint Motion for an Extension of Time to File Pre-Trial Motions state:

1. When the parties originally appeared in Court, the Government indicated that discovery consisted of approximately 1,000,000 pages.
2. The Government indicated that the discovery would be provided in an orderly fashion on certain dates.
3. To date approximately 15,900 pages of discovery have been provided to Defendants on 3 disks.
4. On or about October 14, 2014, Attorneys in each of the above cases wrote Assistant U.S. Attorney Jim Delworth requesting a status on the outstanding discovery.
5. Mr. Delworth responded to these letters on October 16, 2014. (Exhibit A)
6. It is obvious from Mr. Delworth's response that Defendants will not be provided all of the discovery in this case by November 17, 2014.
7. More troubling is the fact that unlike the orderly "roll out" of discovery envisioned by the Government in July of 2014, there is no end date when Defendants will be provided the remaining 999,985 pages of discovery.

8. Defendants will require at least 6 months from the date that all discovery has been received in which to review the discovery, discuss same with their clients and to file pre-trial motions.

WHEREFORE, Defendants request that this Honorable Court establish a discovery cut-off date of December 1, 2014 in which the Government is obligated to provide Defendants all of the discovery in this case and that Defendants be given until June 19, 2015 in which to file pre-trial motions.

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CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2014, a copy of the attached *Defendant's Joint Motion For Extension of Time to File Motions* was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

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